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# Alaska Airlines

2003 AUG -5 A 11:28

August 27, 2003

Docket Management System  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh St., SW  
Washington, D.C. 20591

Re: Docket number FAA-2003-15085 - 42

Dear Sir or Madam:

Alaska Airlines takes Hazardous Materials transportation very seriously. Given our business market, we must. Air transportation is the only way goods can reach the consumer in many communities in the State of Alaska. To that end, we carry a large number of hazardous materials shipments.

Therefore, it was with great interest that we reviewed and considered the proposed rule for Hazardous Materials Training Requirements. However, we were severely disappointed with its content and proposal. It clearly misses the mark in many regards, especially regarding the proposed training curriculum.

Aside from the proposed training curriculum being onerous and overly burdensome, it fails to adequately address the type of training required of airline personnel. We fail to understand why a flight attendant needs to be trained to the level of an agent at the air cargo facility who accepts dangerous goods shipments from shippers, yet aircraft loading personnel don't require training relative to the Notice to Pilot-In-Command. Aircraft loaders at most carriers are intimately involved with the Notice to Pilot-In-Command process. They are the ones placing the package on the aircraft, certifying that no packages are damaged or leaking, and are actually notifying the pilot that the package is onboard. Why should a Flight Attendant be required to learn about packaging requirements when they never even see, let alone touch, a dangerous goods cargo package, yet aircraft loading personnel who actually handle the packages don't require training in packaging? In reality, neither of these work groups need that training because they aren't doing the packaging. And what about aircraft load planners? They were totally left out of the matrix, yet at many carriers, play a significant role in the loading process and must be aware of weight and compatibility issues. And what is intended by requiring full hazardous materials training for persons involved in the shipping of company material? Does that mean the person who works in our uniform shop, who packages up blouses, ties, slacks, jackets, etc., must undergo 4-5 days of hazardous materials training? Does company material include paychecks? Would we have to train our accounting clerks who bundle up paychecks to be full-fledge dangerous goods agents? Where is the benefit to all this superfluous training? The proposed training matrix is flawed to the nth degree.

The FAA expects this proposal to cost the air carriers approximately \$107.5 million over 10 years. We have determined a conservative estimate of \$12 million in the first year alone, just to bring everyone up to the level of knowledge indicated by the matrix in proposed Appendix N. And that just covers the wages for current rank and file employees. Supervisory/management employees were not included in that estimate because we are unclear how far up the management chain that requirement goes. Nor does that figure include funds necessary to establish a whole new training department, nor the costs for additional staffing to cover the extra hours employees must be in training, along with associated hotel and meal expenses. And we are a small carrier compared to many others. The total for all carriers will be staggering; well beyond the \$107.5 million estimate.

And then there's the issue of over-training – the negative impact it has on employees when you overload them with useless information. I will let the Air Transport Association expand on that issue in further detail in their comment.

Bottom line – there is nothing wrong with the current requirement for 'function specific training'. The carriers know which of their employees perform functions related to hazardous materials, and they know what those employees need to know. By using a broad paint brush and assuming that we all run our operations the same way is wrong. There is no reason in the world that the pilots at Alaska Airlines should be trained to the same level as an agent who accepts dangerous goods at the cargo facility.

Aside from the proposed training matrix there are a substantial number of additional serious concerns, which will be covered by the comments the Air Transport Association is submitting on behalf of their member carriers. However, we wanted to file a separate comment to reiterate the preposterous training requirements outlined in Appendix N. Those requirements are without reason, and inconsistent with the ultimate goal – to improve and maintain safety. We request that this proposed rule be withdrawn.

Sincerely,

A handwritten signature in black ink, appearing to read "Marilyn Dirkx".

Marilyn Dirkx  
Manager, Dangerous Goods Compliance